

#### IV. REMARKS

Applicants have considered the Office Action mailed on January 29, 2007. Claims 1 – 40 are pending in this application. By this amendment, claims 1, 2, 5, 12, 20 – 21 and 30 – 31 have been amended. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, claims 2 and 12 are objected to for informalities. Claims 1 – 3, 7 – 12, 14 – 15, 18 – 19, 30 and 33 – 38 are rejected under 35 U.S.C. §102(b) as allegedly being unpatentable over primary reference, Maurille U.S. Patent No. 6,484,196, hereinafter “Maurille” in view of secondary reference, Newman, U.S. Patent No. 7,003,724, hereinafter “Newman”. Claim 4 is rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Maurille in view of Newman and further in view of Baker, US Patent No. 6,546,417, hereinafter “Baker”. Claim 13 and 39 are rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Maurille in view of Newman and further in view of Tang et al., US Pat. No. 5,793,365, hereinafter “Tang”. Claims 5 – 6, 15 – 17, 20 – 27, 29, 31 – 32 and 40 are rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Maurille in view of Newman and further in view of Borwankar, US Patent No. 6,594,693, hereinafter “Borwankar”. Claim 28 is rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Maurille in view of Newman and further in view of Borwankar and Tang. Applicants disagree with the Office’s interpretation of the claimed invention and respectfully submit the following arguments for the Office’s consideration.

## **A. OBJECTION TO CLAIMS 2 AND 12**

Applicants have amended claims 2 and 12 to comply with formal requirements. Claim 2 has been amended such that it ends with a period. Claim 12 has been amended such that the phrase “set of messages an associated” is replaced with the phrase “set of messages includes an associated”.

## **B. REJECTION OF CLAIMS 1-40 UNDER 35 U.S.C. §103(a)**

With regard to the 35 U.S.C. §103(a) rejection over primary reference, Maurille, in view of secondary references, Newman, Baker, Tang and Borwankar, Applicants submit that the combined references cited by the Office fail to teach or suggest each and every feature of the claimed invention. For example, with respect to independent claim 1, Applicants respectfully submit that the combined references fail to teach or suggest, *inter alia*, “...a conversation map for illustrating relationships between messages in the conversation, wherein the conversation map changes according to the branch of messages displayed in the second column”. The Office states, on page 8 of the current Office Action, that Maurille and Newman do not teach or suggest “...a conversation map...” but cites col. 11, lines 7 – 42 in Borwankar as a cure to this deficiency of the combined disclosures. Borwankar teaches a directory of messages and conversations for organizing a particular participant’s conversation list and general information of the conversations for easy accessibility, validation and authentication routines, col. 11, lines 12 – 24. Such general information in Borwankar also includes historical information of the messages which are stored “according to size, chronology, or other category, deemed useful to a particular participant”, col. 11, lines 28 – 30. However, despite the easy access of information,

Borwankar's directory does not change according to the branch of messages displayed in second column, as opposed to the conversation map of the claimed invention. As such, Borwankar does not cure the deficiency of Maurille and Newman. A person of ordinary skill would not be motivated to incorporate Borwankar into the combined teachings of Maurille and Newman because there is no likelihood that such a combination would lead to the claimed user interface. Accordingly, Applicants respectfully request that the Office withdraw this rejection and allow the claim.

With respect to independent claims 20 and 30, Applicants reiterate the foregoing arguments and respectfully request that the Office withdraw the rejections and allow the claims.

Furthermore, with regard to the Office's rejection of dependent claims based on other arguments, Applicants assert that the dependent claims are allowable in view of the foregoing arguments. In addition, Applicants submit that all dependant claims are allowable based on their own distinct features. However, for brevity, Applicants will forego addressing each of these rejections individually, but reserve the right to do so should it become necessary. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

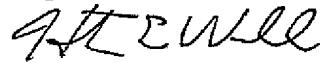
## **V. CONCLUSION**

In addition to the above arguments, Applicants submit that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicants do not acquiesce to the Office's interpretation of the claimed subject matter or the references used in rejecting the claimed subject matter. Additionally, Applicants do not acquiesce to the Office's combinations and modifications of the various references or the motives cited for such

combinations and modifications. These features and the appropriateness of the Office's combinations and modifications have not been separately addressed herein for brevity. However, Applicants reserve the right to present such arguments in a later response should one be necessary.

In light of the above, Applicants respectfully submit that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,



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Dated: April 30, 2007

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